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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<u>In re:</u>	)	<b>Chapter 11</b>
	)	
<b>GENERAL MOTORS CORP., et al</b>	)	<b>Case No. 09-50026 (REG)</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered</b>

**OBJECTION OF AP MOLLER MAERSK  
AND AFFILIATES TO DEBTORS' MOTION,  
*INTER ALIA*, TO ASSUME AND ASSIGN  
CERTAIN EXECUTORY CONTRACTS**

A.P. Moller-Maersk A/S, Maersk Inc., Maersk Inc. as agent for A.P. Moller-Maersk A/S trading as Maersk Line, Safmarine Inc., Safmarine Inc., as agent to Safmarine Container Lines N.V., and Safmarine Container Lines N.V. and their affiliates (collectively, the "Maersk Entities"), by and through their undersigned counsel, hereby object to the motion (the "Motion") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for an order authorizing the Debtors to, *inter alia*, assume and assign certain executory contracts to Vehicle Acquisition Holdings, LLC, and respectfully state as follows:

**BACKGROUND**

1. Pursuant to a series of contracts, the Maersk Entities provide the Debtors and certain of their non-debtor affiliates with shipping, warehouse and related logistical services on a global basis.

2. On or about June 5, 2009, the Debtors served certain parties to executory contracts with their *Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto* (the "Assumption Notice"), pursuant to which executory contract parties whose contracts may be assumed were directed to a website (the "Cure Website") listing cure amounts and giving such parties ten days from the date of the notice within which to assert objections.

### **OBJECTION AND RESERVATION OF RIGHTS**

3. The Maersk Entities are large and diverse international companies which have headquarters in Denmark and offices all over the world. A number of different Maersk Entities in different locations do business with the Debtors and/or their non-debtor affiliates. Although some of the Maersk Entities received separate Assumption Notices, the Maersk Entities have been unable to determine with certainty which of the other Maersk Entities which do business with the Debtors may have received Assumption Notices. In addition, given that several of the Assumption Notices sent to the Maersk Entities were not received until June 10, 2009, such Maersk Entities have been able to determine whether they agree with the cure amounts listed on the Cure Website.

4. The Maersk Entities reserve their rights to object to the Debtors' cure amounts once they have determined the universe of Assumption Notices sent to them and had an opportunity to reconcile the cure amounts with their records.

**CONCLUSION**

**WHEREFORE**, the Maersk Entities respectfully request that the Motion be conditioned on the resolution of appropriate cure amounts, together with such other and further relief as this Court deems just and proper.

Dated: New York, New York  
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